

August 10, 2004

Via ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, SW
Washington, DC 20554

Re: MB Docket No. 04-207; A La Carte and Themed Programming and Pricing
Options for Programming Distribution on Cable Television and Direct Broadcast
Satellite Systems

Dear Ms. Dortch:

American Women in Radio and Television, Inc. (“AWRT”) hereby submits this letter in the Commission’s proceeding to examine *a la carte* services on cable television and direct broadcast satellite systems (MB Docket No. 04-207). As an organization strongly committed to equality for women, AWRT understands the power of the media in American society to positively impact women’s lives. Increased access and exposure to media informs women when their rights are at risk, promotes positive images of women, and helps them to make informed decisions about their future and the future of this country. For this reason we strongly support greater diversity in media ownership, employment and programming.

We understand that the instant proceeding is intended to inform the Commission’s examination of cable *a la carte*, a proposal that would permit consumers to buy cable channels individually rather than in bundles. AWRT believes that mandatory *a la carte* carriage requirements may have a significant negative impact on the so-called “niche” networks – like Oxygen, Lifetime and WE – that cater to particular interests or demographics, such as women, minorities and non-English language speakers. From comments already submitted by these niche programmers, it is clear that these programmers consider cable *a la carte* an extreme threat to their survival undermining existing multicultural networks and erecting a substantial barrier to entry for new networks and erode media diversity.¹

Under current cable operations, niche networks catering to women and other targeted audiences have a very difficult time obtaining distribution on cable. *A la carte* will only exacerbate this problem and make it more difficult for these channels to attract advertisers and subscribers. If *a la carte* becomes mandatory, there will be less diversity and fewer channels devoted to women and minorities. As a recent GAO report concluded, “some cable

¹ See, for example, the letter to the House Energy and Commerce Committee dated May 12, 2004 from the chief executives of BET Holdings, TV One, the International Channel and Si TV.

networks, especially the small and independent networks would not be able to gain enough subscribers to support the network.”²

In keeping with AWRT’s longstanding commitment to women’s empowerment and equality, we urge the FCC to heed the concerns expressed by multicultural programmers and civil rights groups regarding the impact of mandatory cable a la carte on media diversity and to recommend to Congress that it not be enacted.³ It would be unfortunate if a proposal that is intended to give consumers more choice and control were to inadvertently reduce diversity in programming and with it the number of women and minority owners, executives and employees in the MVPD industry.

Respectfully submitted,

AMERICAN WOMEN IN RADIO AND
TELEVISION, INC.



Maria E. Brennan
Executive Director

8405 Greensboro Drive
Suite 800
McLean, VA 22102
(703) 506-3290
info@awrt.org

² Report of the U. S. General Accounting Office: “Issues Related to Competition and Subscriber Rates in the Cable Television Industry,” GAO-04-8, rel. Oct. 24, 2003.

³ Some of the organizations expressing concern about the impact of a la carte on diversity in letters to the House Energy and Commerce Committee or in this proceeding include the NAACP, the Minority Media and Telecommunications Council, the National Asian Pacific American Legal Consortium, the Urban League and the Black Caucus.